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Counsel for Defendant Howard

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

COLLIN HOWARD,

Defendant.

Case No.: CR 19-00075 BLF

**STIPULATION AND
[PROPOSED] ORDER RE:
SAFETY VALVE ELIGIBILITY**

IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by its undersigned counsel, and the defendant, Collin Howard, as follows:

- 1) On February 14, 2019, Collin Howard was charged with four counts of violating 18 U.S.C. § 841(a)(1) for distribution and possession with intent to distribute cocaine (Count One), distribution and possession with intent to distribute methamphetamine (Count Two), distribution and possession with intent to distribute five grams and more of methamphetamine (Count Three), and possession with intent to distribute five grams and more of methamphetamine (Count Four).
- 2) Counts Three and Four each carry a mandatory minimum sentence of five years imprisonment.
- 3) With respect to Counts Three and Four, both of which carry mandatory minimum sentences,

1 the parties stipulate and agree that the Defendant is not currently ineligible for safety valve relief
2 under 18 U.S.C. § 3553(f)(2).

3 IT IS SO STIPULATED AND AGREED.

4
5 Dated: August 11, 2020

6 STEVEN G. KALAR
7 Federal Public Defender
8 Northern District of California

9 /S

10 SEVERA KEITH
11 Assistant Federal Public Defender

12 Dated: August 11, 2020

13 DAVID L. ANDERSON
14 United States Attorney
15 Northern District of California

16 /S

17 SARAH GRISWOLD
18 Assistant United States Attorney

19 IT IS SO ORDERED.

20 Dated: August ___, 2020

21 HONORABLE BETH LABSON FREEMAN
22 United States District Court Judge